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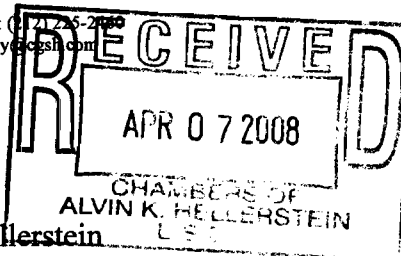
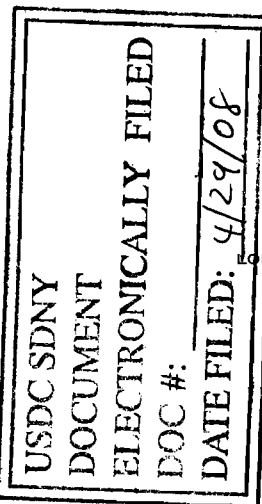
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Honorable Alvin K. Hellerstein
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10001

Re: Consolidated Edison Company of New York, Inc., et al., The Port Authority
 of New York and New Jersey, 07 CV 10582 (AKH)

Dear Judge Hellerstein:

This firm represents Citigroup Inc. and Citigroup Global Markets Holdings Inc. (collectively, "Citigroup") in the related matter of Aegis Ins. Servs., Inc. et al v. Seven World Trade Ctr. Co. et al, 04 CV 7272 (AKH) ("Aegis").

I write to request that Citigroup be permitted to intervene in the above-referenced matter for the sole purpose of addressing issues raised by the parties in connection with the affirmative defense of judicial estoppel asserted by the Port Authority of New York and New Jersey (the "Port Authority"), which turns largely upon arguments asserted by Citigroup in Aegis concerning the proper interpretation of the lease between Consolidated Edison Company of New York, Inc. ("Con Edison") and the Port Authority, dated May 29, 1968 (the "Con Ed Lease") of which Citigroup has asserted it is a third party beneficiary.¹ See Port Authority Mem. of Law in

¹ The Court has held in related matters that parties need not request the right to intervene via formal pleadings. See Tr. of Status Conf. on March 18, 2008, at 29-30 (granting oral request to intervene, explaining that: "You know we're going to start a lot of intervention pleadings and the like . . . I'm going to make a ruling that's affecting all the cases . . . I'm ruling that you are going to be treated as a party in that motion . . . You are going to get notice. You don't have to ask me for permission to file briefs. You can file oppositions.") (included as Exhibit A within the Appendix enclosed herewith); see also Fed. R. Civ. P. 24(a) (Intervention of Right: "On timely motion, the court must permit anyone to intervene who . . . claims an interest relating to the . . . transaction that is the subject of the action, and is

April 4, 2008
 The motion to intervene is denied. The materials and arguments being offered are all unavailing & the court, and no useful purpose is served by the added complication of an intervention.
 4/28/08
 Dept 4/Hellerstein